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USDA/FSIS Hearing Clerk  
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Re: Docket No. 98-045N

Food safety hazards need to be addressed at the source. The prime source of danger to the American public from food today lies in the animal production methods inherent in the practices sometimes known as "factory farming." Problems include overcrowding animals, subjecting them to stressful procedures and conditions, feeding them chicken litter and feces, rendering diseased animals into animal feed, excessive use of antibiotics and other drugs, and inhumane and unhygienic transport and slaughter.

As a physician, I am particularly aware of the growing problem of drug-resistant infections caused by antibiotic overuse. Much of this overuse occurs in agribusiness and is necessitated by farming methods which substitute drugs for the uncrowded, sanitary living conditions that would keep the animals healthy without massive antibiotic support. These practices inadvertently promote drug resistance in bacteria, which then pass resistance factors to other organisms in the same manner as they do when antibiotics are overused in humans. Furthermore, resistant organisms escape into the general environment in animal waste runoff, and contaminate meat during slaughtering and processing. According to the National Academy of Sciences, if antibiotics were not used in this manner, annual food costs would increase only by \$5-10 per person. This would be a small price to pay to keep antibiotics effective in curing human illness.

Food safety hazards must be addressed with mandatory safeguards at the animal production stage. These include more humane and hygienic treatment and conditions for farm animals. Regulatory authority at the production stage must be expanded, and adequate funding must be actively sought. Short of this, any food safety plan is doomed to fail.

Sincerely,

Rhonda D. Wright, M.D.

cc: Members of the President's Inter-Agency Council on Food Safety